

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

HAROLD LEE KROMELBEIN,	:	CIVIL ACTION
Plaintiff	:	
	:	
v.	:	NO. 3:11-cv-01598-ARC
	:	
ENVISION PAYMENT SOLUTIONS,	:	
INC.,	:	
Defendant	:	JURY TRIAL DEMANDED

**DEFENDANT ENVISION PAYMENT SOLUTIONS, INC.’S
MOTION FOR SUMMARY JUDGMENT AS TO ALL CLAIMS**

Defendant Envision Payment Solutions, Inc. (“Envision”), by counsel, and hereby moves this Court for summary judgment pursuant to Federal Rule of Civil Procedure 56. Plaintiff Harold Lee Kromelbein (“Plaintiff”) has alleged that Envision violated the Fair Debt Collection Practices Act (“FDCPA”), 15 U.S.C. § 1692 *et seq.* Envision seeks judgment in its favor as to all claims by Plaintiff. This Motion is accompanied by a statement of facts pursuant to L.R. 56.1, and a Brief in Support of Motion for Summary Judgment (hereinafter “Brief in Support”) has been filed contemporaneously with this Motion pursuant to L.R. 7.5.

Respectfully submitted,

FINEMAN KREKSTEIN & HARRIS, P.C.

By: /S/ Jennifer Tatum Root
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Attorneys for Defendant

Dated: July 27, 2012

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CERTIFICATE OF NONCONCURRENCE

The undersigned sought concurrence in the motion from counsel for Plaintiff. Counsel for plaintiff does not concur with Defendant Envision Payment Solution, Inc.'s Motion for Summary Judgment.

FINEMAN KREKSTEIN & HARRIS, P.C.

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CERTIFICATE OF SERVICE

I, JENNIFER TATUM ROOT, ESQUIRE, hereby certify that on or about this date, I served a true and correct copy of the foregoing electronically, or by first class mail, postage prepaid, or telecopy on the following:

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Dated: July 27, 2012